

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JANE DOE, alias )  
                        )  
Plaintiff,           ) Civil Action No. 3:23-cv-00197  
                        )  
                        ) District Judge Trauger  
v.                    )  
                        )  
DYLAN CHRISTOPHER ADLER, )  
                        )  
Defendant.           ) )

**AGREED JUDGMENT**

As evidenced by the signatures of counsel below, Plaintiff Jane Doe, alias, and Defendant Dylan Christopher Adler agree to the entry of this Agreed Judgment against Defendant Dylan Christopher Adler, in the amount of TWO HUNDRED FIFTY THOUSAND 00/100 Dollars (\$250,000.00) (Hereinafter referred to as the ‘Original Judgment or Original Agreed Judgment’). Pursuant to the parties’ Settlement Agreement signed on February 29, 2024, this judgment shall be deemed fully satisfied upon payment of ONE HUNDRED FIFTY THOUSAND 00/100 Dollars (\$150,000.00) (hereinafter referred to as the ‘payment plan Judgment’) plus interest accruing at 4.76% to Plaintiff. Defendant shall make an initial payment to Plaintiff on or before March 5, 2024, of FIFTEEN THOUSAND 00/100 Dollars (\$15,000), followed by regular monthly installments of ONE THOUSAND FOUR HUNDRED SIXTEEN and 10/100 Dollars (\$1,416.10) each month on or before the 15<sup>th</sup> of each month for ten years from the date of the first payment. The first payment shall begin April 15, 2024. Payments shall be made by wire transfer upon wire instructions being provided. In the event wire instructions are not provided or wire transfer is unable to be made by the fault of the financial institution receiving, payments shall be mailed to Vasek & Robbins, PLLC c/o Donnavon Vasek 103 W. Main Street, Lebanon, Tennessee 37087.

Any failure to comply with the payment plan Judgment or the terms of the parties' Settlement Agreement signed on February 29, 2024, shall constitute default and Plaintiff shall be permitted to execute upon the Original Agreed Judgment. Payments shall not be deemed late and in default unless the payment is more than 30 days late. The Plaintiff may not execute against the Original Judgment so long as the Defendant is in compliance with the Payment Plan Judgment.

The Defendant acknowledges that the judgment arises on a cause of action pursuant to 15 U.S.C.S § 6851, Invasion of Privacy, and Intentional Infliction of Emotion Distress filed by Plaintiff and it is agreed by the Defendant that this Agreed Judgment is not dischargeable pursuant to 11 U.S. Code § 523 should the Defendant file for bankruptcy protection under any section of Title 11 of the United States Codes.

Signing the Settlement Agreement and entry of this Agreed Judgment fully resolves all claims of Plaintiff against Defendant asserted in this matter. The Defendant has provided a Statement under oath that he is no longer in possession, actual or constructive, of any photographs of the Plaintiff. In the event that this Defendant was to publish and/or distribute new photographs of the Plaintiff, the Plaintiff may maintain a new cause of action for the same.

Defendant shall cooperate with Plaintiff in her efforts to remove images and video of her from the internet. Cooperate shall mean to reasonably comply with a request and to exercise due diligence in assisting in having the content removed from the internet. Reasonable compliance shall include responding to written requests for cooperation within two weeks. A written request shall be sent by US Mail to Dylan Adler at 15213 Asher Court, Siloam Springs, Arkansas, 72761

The Defendant is permanently restrained and enjoined from contacting the Plaintiff. Any outstanding ordinary court costs shall be taxed to the Defendant.



ALETA A. TRAUGER  
U.S. DISTRICT JUDGE

APPROVED FOR ENTRY:

/s/Donnavon Vasek

Donnavon Vasek, BPR #034474

103 West Main Street

Lebanon, TN 37087

(615) 549-8909

[dvasek@vrlawtn.com](mailto:dvasek@vrlawtn.com)

*Counsel for Plaintiff Jane Doe, Alias*

/s/Gary M. Kellar by Donnavon Vasek with permission via email dated

02/29/24 Gary M. Kellar, BPR#016170

1300 Division St., Suite 300

Nashville, TN 37203

(615) 988-9850

[gkellar@kellarjohnsonpayne.com](mailto:gkellar@kellarjohnsonpayne.com)

*Counsel for Defendant Dylan Christopher Adler*